

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Jurisdictional Separations Reform and) CC Docket No. 80-286
Referral to the Federal-State Joint Board) DA 99-414
)

COMMENTS OF SBC COMMUNICATIONS INC.¹

Pursuant to Public Notice dated February 26, 1999,² SBC Communications Inc. ("SBC") hereby submits its Comments on the report (the "Report") filed on December 21, 1998 by the state members of the Joint Board on Jurisdictional Separations.

I. SIMPLIFICATION AND EVENTUAL ELIMINATION OF SEPARATIONS SHOULD BE THE MAIN GOALS OF THE JOINT BOARD'S SEPARATIONS REFORM EFFORTS.

The Report states that it should be viewed as "a vehicle down a constructive path toward comprehensive separations reform in an expedited fashion."³ However, this is a vehicle without direction if the Joint Board does not define the goals of separation reform. While the Report raises a few valid issues that should be addressed in the context of separation reform, it fails to consider certain critical threshold issues, such as the goals of these efforts. While there is little disagreement that separations reform needs to take place, reform itself should not be the goal. Even the Notice of Proposed Rulemaking ("NPRM") set some general goals and proposed the

¹ SBC Communications Inc. ("SBC") files these Comments on behalf of its subsidiaries, Southwestern Bell Telephone Company ("SWBT"), Pacific Bell, Nevada Bell, and The Southern New England Telephone Company.

² Public Notice, "Report Filed by State Members of Joint Board on Jurisdictional Separations," DA 99-414, released February 26, 1999.

³ Report at 1.

criteria to evaluate the process for accomplishing those goals.⁴ The NPRM's proposed criteria included competitive neutrality and administrative simplicity.⁵ While these criteria make limited appearances in some areas of the Report,⁶ the Report does not chart a course towards any objective. In order to achieve anything "in an expedited fashion," the Joint Board must first establish specific objectives consistent with the 1996 Act.

As the NPRM recognizes, the immediate goal should be to simplify the separations process: "to lessen the regulatory burden on both carriers and the Commission in furtherance of the 1996 Act's deregulatory national policy framework."⁷ Given that the ultimate goal should be to eliminate separations, USTA's freeze proposal (which SBC supports) is ideally suited to accomplish the goal of administrative simplicity, while preparing for the eventual elimination of the whole process. Goals such as administrative simplicity and eventual elimination should be adopted by the Joint Board and used as the underlying criteria for evaluating each of the issues it believes should be addressed in this proceeding.

Whatever it does, the Joint Board should clearly identify its goals and consider every issue in terms of reaching those goals. And in the case of immediate goals, such as simplification, the Joint Board should proceed without further delay.

Since separations is becoming less important, it hardly makes any sense to seek to perfect the allocations of costs between jurisdictions. Therefore, while trying to guess the impact of new

⁴ Jurisdictional Separations Reform and Referral to the Federal-State Joint Board, CC Docket No. 80-286, 12 FCC Rcd 22120, ¶¶ 22-30 (1997) ("NPRM").

⁵ Id., ¶¶ 23-25.

⁶ See, e.g., Report at 15 ("addresses the concerns that gave rise to the freeze concept").

⁷ NPRM, ¶ 25.

technologies or competition on the jurisdictional allocations may be an interesting intellectual exercise, this theoretical analysis would not advance the goal of making separations reform easy to administer. As separations reform is not going to lead the way to any future regulatory framework, it would be best if separation reform got out of the way of meaningful regulatory reform. As the first step for price cap companies, the Commission should simply freeze all allocation percentages and category relationships based on the latest annual data, as USTA and SBC have recommended.

II. WHEN THE ISSUES IN THE REPORT ARE EVALUATED IN TERMS OF GOALS SUCH AS ADMINISTRATIVE SIMPLICITY, IT BECOMES CLEAR THEY DO NOT ALL NEED TO BE CONSIDERED.

In the next eight sections, SBC responds to the Report's principal issues, as summarized in the Public Notice, and shows why some of them need not be considered or resolved.

A. ***Confiscation liability.*** The state members maintain that some form of jurisdictional separations will be required as long as a potential confiscation liability remains. The state members do not believe that it is clear that competition alone would eliminate such claims.

Movement toward a more competitive environment is inevitable and should lead to less regulation. The result of such competitive evolution of the industry is reduced reliance on claims of confiscation.

As the reasons for separations become less important, the burden of separations requirements should be reduced. Ultimately, the remaining requirements can be eliminated altogether either when the ILECs' prices have been deregulated in both jurisdictions or when one jurisdiction has sole responsibility for pricing regulation.

B. ***Effects of new technologies on the separations process.*** The state members find that several technological changes, such as the shift from circuit to packet switches, may require changes in how traffic sensitive and non-traffic sensitive joint and common costs are measured and allocated.

The Report indicates that technological changes have made allocations more arbitrary. However, the Report does not provide any evidence of any problem requiring a separations based change. In fact, one of the principal "problems" identified in the Report, regarding "technology-driven shifts of the boundary between traffic sensitive and non-traffic sensitive costs,"⁸ is really a non-issue. The traffic sensitive/non-traffic sensitive distinction for the local dial switch was eliminated with the 1988 changes to the separation rules. This elimination was explained as follows: "The Joint Board found that given the changing technology and the introduction of digital switching systems, the distinction between TS and NTS costs is difficult to calculate and justify."⁹

The Commission's goal in this 1987 ruling are instructive for the current efforts:

We believe that adoption of all these separations revisions will further our goal of simplifying and improving the currently complex and unduly burdensome separations procedures. This reduced administrative burden will reduce carrier's operating costs, thus benefiting ratepayers.¹⁰

If this simplification was desirable in 1987, then it is imperative in 1999, given the dramatic changes in regulation and the deregulatory mandate of the 1996 Act. Any attempt to refine the process due to technological change is likely to move toward more, rather than less, burdensome regulation. Instead, the Commission should implement a freeze of the separation process to avoid burdensome technology-driven distinctions.

C. *Difficulties in tracking usage.* The state members claim it has become increasingly difficult to track jurisdictional usage, most notably in connection with the Internet, where,

⁸ Report at 7.

⁹ MTS and WATS Market Structure; Amendment of Part 67 (New Part 36) of the Commission's Rules and Establishment of a Federal-State Joint Board, 2 FCC Rcd 2639, 2640, ¶ 5 (1987).

¹⁰ Id. at 2642, ¶ 18.

for example, traditional usage measurements overlook the packet-switched part of the communication chain.

The Report describes a situation that was addressed by the Joint Board and the Commission in 1989 related to what is generally referred to as "mixed use of special access lines."¹¹ The Joint Board and the Commission examined this issue thoroughly and the current ten percent rule was adopted. Because there is no reason to believe that this issue needs to be revisited, the Joint Board and the Commission should not take any action to reconsider the separations rules governing private lines.

However, the Joint Board does need to re-examine the Report in light of the Commission's recent declaratory ruling that Internet traffic bound for an Internet Service Provider ("ISP") is "a continuous transmission from the end user to a distant Internet site"¹² that is jurisdictionally mixed, but largely interstate.

D. *Effects of end-user charges.* The state members claim that since 1986, when the Commission required some costs assigned to the interstate jurisdiction to be recovered from end-users through the subscriber line charge, there has been no direct relationship between the level of costs assigned to either jurisdiction and the level of basic monthly charges paid by customers.

This is a ratemaking issue, not a separations issue. The Report states that: "The separations process may once have provided a forum for addressing the fundamental rate design issue of flat versus usage based charges. In its current form, separations no longer provides that forum."¹³ Clearly this was not the intent of separations. Section 36.1 states:

¹¹ MTS and WATS Market Structure; Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, 4 FCC Rcd 5660 (1989).

¹² Implementation of the Local Competition Provisions in the Telecommunications Act of 1996; Inter-Carrier Compensation for ISP-Bound Traffic, CC Docket Nos. 96-98 & 99-68, Declaratory Ruling and Notice of Proposed Rulemaking, FCC 99-38, released February 26, 1999, ¶ 13.

¹³ Report at 9.

The separations procedures described in this Part are not intended to be interpreted as indicating what property, revenues, expenses and taxes, or what items carried in the income, reserve and retained earnings accounts, should or should not be considered in any investigation or rate proceeding.¹⁴

The Report even acknowledges that the absence of a "direct relationship between the level of costs assigned to either jurisdiction and the level of basic monthly charges paid by customers."¹⁵ Since the Report does not recommend a reversal of direction to now establish a tie between separations and ratemaking, the intent of this section of the Report is unclear and confusing. The Report does not provide any basis whatsoever to consider such a fundamental change.

The state commissions are responsible for determinations regarding ILECs' basic local service rates based on a variety of criteria and methods. For example, in order to keep residential rates low, they may have authorized higher business rates. The Commission should not consider imposing a strict relationship between separated costs and rates, if that is what the Report is suggesting. That would be an enormous step backwards, contrary to the deregulatory mandate of the 1996 Act.

Certainly, these are ratemaking decisions that must be left to the state's discretion. Or, in the case of interstate charges, any such ratemaking issues should be addressed in the context of the Part 61 price cap rules or access reform, not separation reforms.

E. *Section 254(k).* The state members believe that Section 254 of the 1996 Act, which provides that "services included in the definition of universal service bear no more than a reasonable share of joint and common costs of facilities used to provide those services," may require accounting and separations rule changes.

¹⁴ 47 C.F.R. § 36.1(h).

¹⁵ Report at 9.

It is not clear that any accounting or separation changes are required by Section 254(k) and, if so, what changes are required. First, the Universal Service Joint Board and the Commission (in CC Docket No. 96-45) have not put into place a federal universal service mechanism for non-rural companies, although this is supposed to occur before July 1, 1999.

Second, for purposes of the federal universal service process, the Commission is planning to use a hypothetical forward-looking economic cost model, which would have no direct relationship to the actual, book costs that are subject to jurisdictional separation under Part 36. Indeed, even the jurisdictional split of universal service support is being addressed in universal service proceedings, and thus, it is unclear why this Joint Board should duplicate efforts by considering the same or related issues. Whether any accounting rule changes are considered necessary for purposes of Section 254(k) remains to be seen, although SBC maintains that they are not, and in any event, they would not require this Joint Board's attention.

For these, among other reasons, Section 254(k) does not present any issues to be decided in this proceeding.

F. *Competitive services.* The state members indicate that any reform of jurisdictional separations must take into account how costs are allocated between the jurisdictions when certain services are deregulated. In this regard, the state members claim that such reform may require a close coordination between Parts 36 and 64.

It is not clear why the state members are concerned about the impact of Part 64 cost allocation on the separations process. If the state members have specific concerns, they need to explain them more clearly and state exactly what adverse consequences they believe Part 36 may suffer. SBC maintains that Parts 36 and 64 should continue to be separate and the Joint Board has no involvement in the Part 64 process.

As telecommunications services become more competitive and are removed from federal Title II regulation, the Commission should consider classifying them as Part 64 nonregulated

services. Absent preemption, the Part 64 federal accounting treatment does not interfere with any competitive treatment the states may wish to apply to a regulated service. Indeed, a number of states have adopted alternative forms of regulation for certain "competitive services" that are not removed from regulation. While there may be some changes in the costs assigned to the jurisdictions as a result of deregulation in Part 64, it does not mean that there needs to be any separations changes.

Since the Report has not shown that Part 64 changes are creating any specific problems that require changes in Part 36, there is no reason to conclude that the degree of coordination between Parts 36 and 64 needs to be any greater than it has been previously.

G. *Modified structure.* The state members recommended that the separations Joint Board consider proposals that fundamentally alter the basis upon which costs are allocated between the jurisdictions, e.g., the GTE and US WEST proposal that proposes assigning significantly more costs and revenues to the state jurisdiction.

While SBC agrees that a proposal such as that of GTE/US West has the potential to eliminate the need to perform most, if not all, separation procedures, SBC maintains that such proposals should be considered in the long-term. In the more immediate future, the USTA freeze proposal is a more viable alternative. SBC will not comment at this time on the specifics of the GTE/US West proposal, as it need not be considered in the current phase of this proceeding.

H. *Transitional reform.* The state members recommend that, until comprehensive separations reform can be adopted, the Joint Board should adopt on an interim basis a three-year rolling average, which would reduce the impact of usage changes and resulting cost shifts from year to year.

The Report's three-year rolling average proposal should not be adopted. This proposal fails the NPRM's proposed evaluative criteria and fails to adequately "address[]" the concerns that gave rise to the freeze concept."¹⁷ The NPRM suggested that separations reform proposals

¹⁷ Report at 15.

should be evaluated from the perspective of administrative simplicity and competitive neutrality. USTA proposed the freeze concept "to reduce complexity and compliance burdens."¹⁸ Another attractive virtue of the freeze concept, noted by its supporters was that it will provide a significant measure of stability.¹⁹ While the Report's three-year average proposal might provide some limited measure of stability, it does not satisfy any of the other criteria.

The Report's proposal is not administratively simple. It would likely impose a substantially greater administrative burden than the existing procedures. In fact, it would require all of the existing procedures to continue, and require additional procedures to produce an ongoing average. SBC's companies would continue to be required to collect and analyze detailed jurisdictional usage information and other data on investments and expenses on an ongoing basis. In addition, the proposal would require SBC to produce a rolling average of, not just three years, but thirty-six individual months of data, given the monthly separations processing that SBC's companies perform. On top of this, the Report proposes to require complex retroactive adjustments based on recent and future developments. Since even the Report acknowledges that usage is now more difficult to track, it makes no sense to add another layer of complexity to this usage-based process. The Report's proposal would receive the highest grade if the evaluative criterion was to make the rules as administratively complex as possible. Given that the goal is to simplify and reduce the burden of regulation, the Report's proposal should be summarily thrown out.

¹⁸ USTA Comments, CC Docket No. 80-286, filed December 10, 1997, at ii.

¹⁹ Id. at 12; SBC Comments, CC Docket No. 80-286, filed December 10, 1997, at 8.

This proposal is also less compatible with the goal of competitive neutrality than USTA's freeze proposal. The Report's proposal imposes much more onerous regulation than USTA's freeze proposal, and thus, the disparity between ILECs and competitors is much greater as well.

III. CONCLUSION.

By proposing an interim solution, the Report recognizes the urgency of addressing concerns such as administrative burden that gave rise to the freeze concept. Before considering other issues, the Joint Board should proceed without any further delay to recommend a transitional reform of separations. Instead of the complex three-year rolling average, the Joint Board should recommend USTA's freeze because a freeze would bring meaningful simplification to the Part 36 process and come closer to a competitively neutral method of regulation.

All of the Report's issues should be evaluated as suggested above to determine whether they move the process significantly closer to the goals of this proceeding, the setting of which should be the starting point of any further deliberation by the Joint Board.

Respectfully submitted,

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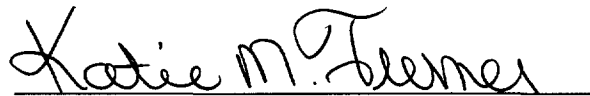
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CERTIFICATE OF SERVICE

I, Katie M. Turner, hereby certify that the foregoing, "CC DOCKET NO. 80-286, DA 99-414, COMMENTS OF SBC COMMUNICATIONS INC. IN THE MATTER OF JURISDICTIONAL SEPARATIONS REFORM AND REFERRAL TO THE FEDERAL-STATE JOINT BOARD." in CC Docket No. 80-286, DA 99-414 has been filed this 30th day of March, 1999 to the Parties of Record.

A handwritten signature in cursive script, reading "Katie M. Turner", is written over a horizontal line.

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